

OAO91 (Rev. 12/03) Criminal Complaint

United States District Court  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

AUG 28 2014

Southern DISTRICT OF Texas

David J. Bradley, Clerk

UNITED STATES OF AMERICA  
V.

## CRIMINAL COMPLAINT

Veronica Saldivar  
U.S. Citizen  
YOB 1972Case Number: M-14-1683-M-02

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about May 2012 in Hidalgo County, in the Southern District of Texas defendant(s) did,

## Offense Description

Knowingly or willfully paid or offered to pay either for registration to vote or for voting in a general, special, or primary election held solely or in part for the purpose of selecting or electing any candidate for the office of President, Vice President, presidential elector, Member of the United States Senate, or a Member of the United States House of Representatives.

in violation of Title 42 United States Code, Section(s) 1973i(c).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

Official Title

Please see attached Affidavit.

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ NoApproved by: Leo J. Leo III  
AUSA

Signature of Complainant

Brandon Cook, Special Agent, FBI

Printed Name of Complainant

Sworn to before me and signed in my presence,

Date

August 28, 2014

at

McAllenTexas

City

State

Peter E. Ormsby  
Name of JudgeU.S. Magistrate Judge  
Title of Judge

Signature of Judge

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Brandon Cook, being duly sworn, hereby depose and state:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), and have been so employed since July 2010. I am currently assigned to work public corruption to include election crimes investigations within the San Antonio, Texas Division.
2. Since joining the FBI, I have received law enforcement training in the investigation of criminal violations of federal law within the jurisdiction of the FBI, and have received specialized training and gained experience in arrest procedures, search warrant applications, the execution of search and seizures, and various other criminal laws and procedures.
3. I make this affidavit in support of the issuance of a complaint and arrest warrant for subject Veronica Saldivar (Saldivar).
4. The statements contained in this affidavit are based upon my investigation, information provided by other law enforcement officers, and on my own experience and training as a Special Agent of the FBI. Because the affidavit is being submitted for the limited purpose of securing a complaint, I have not included each and every fact known to me concerning the investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Saldivar violated 42 U.S.C. § 1973i(c).
5. Based upon information gathered during the course of this investigation, including some of the information set forth below, it is believed that Saldivar worked as a *politiquera* during the 2012 Primary Election. Federal candidates were on the ballot for this election. Based upon my knowledge and experience, a *politiquera* is a person who works for a candidate to encourage people to vote, to bring voters to the polls, to ensure that voters select the appropriate candidate, and to pay voters for their votes.
6. Between January and March 2014, the FBI interviewed four individuals regarding the defendant's vote-buying activities during the 2012 Primary Election. On February 26, 2013, FBI agents interviewed a *politiquero*, Campaign Worker 1, who stated that he worked for a Hidalgo County Commissioner in the 2012 Primary Election. Campaign Worker 1 said he bought an eight ball (\$50 worth of cocaine), split it up, and gave it to *politiqueras* Saldivar and Campaign Worker 2 to give to voters to vote for the Hidalgo County Commissioner.
7. On January 15, 2014, FBI agents interviewed Campaign Worker 2, another *politiquera* who worked during the 2012 Primary Election. Campaign Worker 2 stated that a campaign manager for one of the candidates gave ziplock bags containing dime bags of cocaine to *politiqueras* Saldivar and Campaign Worker 2 to give to voters in exchange for their votes.
8. On March 17, 2014, FBI agents interviewed Voter 1. Voter 1 stated that she voted in the 2012 Primary Election and that Veronica Last Name Unknown ("LNU") promised to pay Voter 1 ten dollars for voting for the candidates Veronica LNU was supporting. Veronica LNU paid Voter 1 five dollars after voting and advised she would pay the remaining five dollars

later in the day. When Veronica LNU found out Voter 1 did not vote for the candidates Veronica LNU was supporting, she refused to pay Voter 1 the five dollars. Agents showed Voter 1 a photograph of Saldivar, which Voter 1 identified as Veronica LNU.

9. On February 6, 2014, FBI agents interviewed Saldivar. Saldivar stated that she worked as a *politiquera* during the 2012 Primary Elections and recalled paying approximately seventeen (17) to twenty-nine (29) voters in exchange for their vote during the 2012 Primary Elections. Saldivar recalled personally giving baggies of cocaine to two voters in exchange for their vote during the 2012 Primary Elections. Saldivar provided a list of individuals she recalled paying with cash, beer, cigarettes, or cocaine in exchange for their vote. Saldivar stated that she either paid the voters or brought them to Campaign Worker 1 to be paid.
10. On August 15, 2014, FBI agents interviewed Saldivar at her home to corroborate the information Saldivar previously provided. Saldivar advised that the information previously reported to the FBI was accurate: Saldivar was a *politiquera* in the 2012 Primary Election and that Saldivar did pay voters in exchange for their votes during the 2012 Primary Election.